

REMARKS

Reconsideration and allowance of the above referenced application are respectfully requested.

Initially, applicants apologize for the informality in Claim 13 which is corrected herein.

Claims 1-2, 5-6, 9-10, 13, 15-17, 19-21 and 23-28 stand rejected under 35 USC 103 as allegedly being unpatentable over Parnafes et al. in view of Kuznetsov. These contentions are respectfully traversed, and for reasons set forth herein, the rejection does not meet the patent office's burden of providing a prima facie showing of unpatentability. In addition, a number of new dependent claims are added herein, directed to additional aspects disclosed in the specification. Claims like Claim 31 describe the network policy version numbers, as described in the specification at the top of page 5. Claims like new Claim 32 define how different kinds of encryption can be used in different schemas, as described in the specification page 5 line 24 through page 6 line 21. Each of these claims should be allowable, since none of the cited prior art is in any way suggestive of this feature.

The existing claims should also be allowable. Claim 1 requires receiving a file in a client that includes both a network policy and a specification for translating the policy, translating the policy and configuring a network system that is

based on the translated policy. Claim 1 was rejected based on Parnafes et al. in view of Kuznetsov. With all due respect, this contention is respectfully traversed. Parnafes et al. teaches using COPS protocol technology with a mapping database. Admittedly, this does teach translating network policies. For example, as described in Parnafes et al., the policy must be different for a COPS enabled device then it is for a non-COPS device. See, generally, 766 column 6 lines 9-39. However, Parnafes et al. teaches using a proxy 122 for translation. See the bottom of column 6. As admitted in the official action, Parnafes et al. does not indicate that the policy and the specification for translating are received at the client in a file. The secondary reference to Kuznetsov is used to show this. Kuznetsov teaches a run timecode generator and translator. The translation that is done is done "on-the-fly" using a transformation mechanism. In effect, the translator is dynamically generated object code. See column 7 lines 1-5.

Note that the data map that is used for translation is obtained "at runtime". See, generally, column 6 line 63. Because of this, it should be apparent that the specification for translating the policy cannot be received as part of the file. Rather, according to Kuznetsov, this specification is GENERATED at runtime, not received at all at runtime or at any other time.

Accordingly, if a hypothetical combination of Parnafes et al. in view of Kuznetsov were made, it would obtain a Parnafes et al. type policy translation, along with a Kuznetsov type translator "that generates a dynamically created translator" (see column 7 line 18) at runtime. It would not receive in a client a file that includes both a network policy and a specification for translating. Rather, it would suggest forming a translation map at runtime.

In addition, applicant continues to believe that there is no motivation to make the hypothetical combination of Parnafes et al. in view of Kuznetsov. These teachings would not be operatively combined by one having ordinary skill in the art for reasons previously stated, and specifically because Parnafes et al. would have no need to send such a policy, and in fact the teaching for sending such a policy is obtained only from the present specification, not from the prior art.


In addition, each of the newly added dependent claims should be allowable for additional reasons. Claims like Claim 31 define changing between policies based on its version numbers, something that is not taught or suggested by the cited prior art. Claims like Claim 32 define different versions of encryption being used, again something that is not taught or suggested by the cited prior art. Each of these claims should be additionally allowable for these reasons.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed. Please apply the \$700 extra claim fee, and any other applicable charges or credits, to Deposit Account No. 06-1050.

Respectfully submitted,

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